

EXHIBIT B

CIVIL ACTION NO. 95-1354-CIV-MARCUS

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

87. When reporting prices to Medical Economics and Hearst Corporation and directly to Medicare and the States' Medicaid programs for the pharmaceuticals at issue in this case, the DEFENDANT PHARMACEUTICAL MANUFACTURERS falsely reported amounts far in excess of those reported for OBRA '90 rebate purposes. Therefore, when it benefited the DEFENDANT PHARMACEUTICAL MANUFACTURERS to report highest prices to maximize the reimbursement amount for the select providers from the Medicare and Medicaid programs, they used the false and grossly inflated prices and, when it benefited the DEFENDANT PHARMACEUTICAL MANUFACTURERS to report their true

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prices to minimize the rebates they were required to pay the States' Medicaid Programs, they used the true prices driven low by competition. Accordingly, the DEFENDANT PHARMACEUTICAL MANUFACTURERS knowingly reported false inflated price and cost information, in part, because each DEFENDANT PHARMACEUTICAL MANUFACTURER's participation in the rebate program demonstrates its ability to report accurate prices, yet each DEFENDANT PHARMACEUTICAL MANUFACTURER knowingly failed to use that ability when it knew its price and cost reports were being relied upon in paying and approving Medicare and Medicaid claims.

88. This case focuses on the specified pharmaceuticals that are covered under the States' Medicaid Programs which are sold and/or distributed by the DEFENDANT PHARMACEUTICAL MANUFACTURERS and for which the States' Medicaid Programs rely on the cost and price representations reported by the DEFENDANT PHARMACEUTICAL MANUFACTURERS to pay and approve claims. The pharmaceuticals at issue in this case for which Medicaid has paid claims are identified in the following Table No. 3 together with their respective NDC numbers. By way of example, the claim amount approved by Florida Medicaid for each pharmaceutical in 1996 is compared with the Relator's cost in order to illustrate the grossly excessive payments resulting from the DEFENDANT PHARMACEUTICAL MANUFACTURERS' false representations of price and cost.

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TABLE NO. 3

3(A) DEFENDANT ABBOTT					
DRUG	NDC #	FLORIDA MEDICAID PAYMENT	RELATOR'S COST	PROVIDER'S GROSS PROFIT \$	PROVIDER'S GROSS PROFIT %
Sodium Chloride 0.9% 50 ml	00074-7101-13	\$11.28	\$1.23	\$10.05	817%
Sodium Chloride 0.9% 100 ml	00074-7101-23	\$11.28	\$1.23	\$10.05	817%
Sodium Chloride 0.9% 250 ml	00074-7983-02	\$9.37	\$0.95	\$8.42	886%
Sodium Chloride 0.9% 500 ml	00074-7983-03	\$9.37	\$0.95	\$8.42	886%
Sodium Chloride 0.9% 1000 ml	00074-7983-09	\$11.16	\$1.03	\$10.13	983%
5% Dextrose in Water 50 ml	00074-7100-13	\$11.28	\$1.23	\$10.05	817%
5% Dextrose in Water 100 ml	00074-7100-23	\$11.28	\$1.23	410.05	817%
5% Dextrose in Water 250 ml	00074-7100-02	\$13.67	\$1.33	\$12.34	928%
5% Dextrose in Water 500 ml	00074-7922-03	\$9.53	\$0.96	\$8.57	892%

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3(A) DEFENDANT ABBOTT					
DRUG	NDC #	FLORIDA MEDICAID PAYMENT	RELATOR'S COST	PROVIDER'S GROSS PROFIT \$	PROVIDER'S GROSS PROFIT %
5% Dextrose in Water 1000 ml	00074-7922-09	\$11.13	\$1.12	\$11.01	983%
5% Dextrose/ Sodium Chloride 0.9% 250 ml	00074-7941-02	\$10.24	\$1.03	\$9.21	894%
5% Dextrose/ Sodium Chloride 0.9% 500 ml	00074-7941-03	\$10.23	\$1.03	\$9.20	893%
5% Dextrose/ Sodium Chloride 0.9% 1000 ml	00074-7941-09	\$12.51	\$1.23	\$11.28	917%
Ringers Lactate 250 ml	00074-7953-02	\$11.34	\$1.08	\$10.00	926%
Ringers Lactate 500 ml	00074-7953-03	\$11.34	\$1.08	\$10.26	950%
Ringers Lactate 1000 ml	00074-7953-09	\$12.72	\$1.14	\$11.58	915%
Vancomycin HCL 500 mg	00074-4332-01	\$30.85	\$3.51	\$27.34	779%
Vancomycin HCL 500 mg	00074-6535-01	\$22.19	\$6.29	\$15.90	252%
Vancomycin HCL 1 gm	00074-6533-01	\$61.68	\$5.53	\$56.15	1015%
Vancomycin HCL 5 gm	00074-6509-01	\$138.76	\$35.10	\$103.66	295%

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3(A) DEFENDANT ABBOTT					
DRUG	NDC #	FLORIDA MEDICAID PAYMENT	RELATOR'S COST	PROVIDER'S GROSS PROFIT \$	PROVIDER'S GROSS PROFIT %
Tobramycin Sulfate 20 mg	00074-3577-01	\$4.86	\$1.94	\$2.92	150%
Tobramycin Sulfate 60 mg	00074-3582-01	\$6.21	\$3.68	\$2.53	68%
Tobramycin Sulfate 60 mg	0074-3469-13	\$21.45	\$5.16	\$16.29	315%
Tobramycin Sulfate 60 mg	00074-3254-03	\$16.04	\$3.97	\$12.07	304%
Tobramycin Sulfate 80 mg	00074-3470-23	\$23.45	\$5.57	\$17.88	321%
Tobramycin Sulfate 80 mg	00074-3583-01	\$10.26	\$4.12	\$6.14	149%
Tobramycin Sulfate 80 mg	00074-3578-01	\$9.64	\$3.63	\$6.01	165%
Tobramycin Sulfate 80 mg	00074-3255-03	\$10.72	\$4.33	\$6.39	147%
Tobramycin Sulfate 2000 mg	00074-3590-02	\$241.07	\$87.68	\$153.39	174%
Pentamidine 300 mg	00074-4548-01	\$111.40	\$43.00	\$68.40	159%
Clindamycin Phosphate 300 mg	00074-4053-03	\$11.07	\$1.74	\$9.33	536%
Clindamycin Phosphate 300 mg	00074-4050-01	\$10.99	\$1.47	\$9.52	647%
Clindamycin Phosphate 600 mg	0074-4054-03	\$20.35	\$2.95	\$17.40	589%

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3(A) DEFENDANT ABBOTT					
DRUG	NDC #	FLORIDA MEDICAID PAYMENT	RELATOR'S COST	PROVIDER'S GROSS PROFIT \$	PROVIDER'S GROSS PROFIT %
Clindamycin Phosphate 600 mg	00074-4051-01	\$21.34	\$2.69	\$18.65	693%
Clindamycin Phosphate 900 mg	00074-4052-01	\$26.96	\$3.20	\$23.76	742%
Clindamycin Phosphate 9000 mg	00074-4197-01	\$221.11	\$30.95	\$190.16	614%
Clindamycin Phosphate 900 mg	00074-4055-03	\$27.22	\$3.46	\$23.76	686%
Sodium Bicarbonate 50 ml	00074-6625-02	\$6.57	\$0.62	\$5.95	959%
Sodium Bicarbonate 8.4% 50 ml	00074-6637-01	\$18.28	\$1.66	\$16.62	1001%
Amikacin Sulfate 500 mg, 2 ml	00074-1958-01	\$55.18	\$15.50	\$39.68	256%
Amikacin Sulfate 100 mg, 2 ml	00074-1955-01	\$40.20	\$11.50	\$28.70	249%
Amikacin Sulfate 1 gm, 4 ml	00074-1957-01	\$49.81	\$28.50	\$21.31	75%

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3(A) DEFENDANT ABBOTT					
DRUG	NDC #	FLORIDA MEDICAID PAYMENT	RELATOR'S COST	PROVIDER'S GROSS PROFIT \$	PROVIDER'S GROSS PROFIT %
Heparin Lock Flush 10u/ml, 30 ml	00074-1151-78	\$2.86	\$0.38	\$2.48	652%
Heparin Lock Flush 100u/ml 30 ml	00074-1152-78	\$3.26	\$0.44	\$2.82	640%
Heparin Lock Flush 100u/ml 10 ml	00074-1152-70	\$1.40	\$0.28	\$1.12	400%
Water for Inj. 20 ml	00074-4887-20	\$1.72	\$0.23	\$1.49	647%
Water for Inj. 10 ml	00074-4887-10	\$1.37	\$0.19	\$1.18	621%
Water for Inj. 30 ml	00074-3977-03	\$1.84	\$0.20	\$1.64	820%
Water for Inj. 1000 ml	00074-1590-05	\$11.34	\$1.13	\$10.21	903%
Water for Inj. 1000 ml	00074-7990-09	\$10.27	\$1.04	\$9.23	887%
Water for Inj. 100 ml	00074-4887-99	\$3.42	\$0.71	\$2.71	381%
Dex 5%/ KCl/NaCl 1000 ml	00074-7902-09	\$17.46	\$2.05	\$15.41	751%
Furosemide 40 mg 4 ml	00074-6102-04	\$4.13	\$0.35	\$3.78	1080%

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**PAGES 72 THROUGH 92
HAVE BEEN COMPLETELY REDACTED**

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[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

SECTION NO. 7

**THE DEFENDANT PHARMACEUTICAL MANUFACTURERS'
KNOWLEDGE OF THE FALSE CLAIMS SCHEME**

89. At all times material to this action, each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS acted "knowingly" as that term is defined at 31 U.S.C. §3729(b) by:

A. Causing the presentation of false and fraudulent claims for payment or approval by the Medicare and States' Medicaid programs; and

B. Making and using false statements and/or records for the purpose of getting false or fraudulent claims approved or paid by the Medicare and States' Medicaid programs.

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90. The DEFENDANT PHARMACEUTICAL MANUFACTURERS were clearly placed on notice that their conduct would cause the Medicare and States' Medicaid programs to pay claims for the specified pharmaceuticals in amounts exceeding that permitted by applicable law, in part, because:

A. Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS was on notice of federal statutes and regulations that limit payment of Medicare Part B claims for the specified pharmaceuticals to 80% of a reasonable charge.

B. Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS was on notice of federal statutes and regulations limiting payment of Medicaid claims for the specified drugs to an amount necessary to cover the cost of the pharmaceutical.

C. Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS was on notice that neither the Medicare nor the States' Medicaid programs were authorized or permitted by applicable law to pay claims for the specified pharmaceuticals in excessive amounts.

D. Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS was on notice that federal statutes and regulations prohibited them from making misleading representations about the specified pharmaceuticals, including misleading price or cost representations:

(i) Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS is required to comply with the Federal Food, Drug and Cosmetic Act 21 U.S.C. §321 et. seq., and the regulations promulgated pursuant thereto.

(ii) The price and cost representations about the specified pharmaceuticals constitute advertising that is included in the "labeling" provisions of the Federal Food and Drug Act and related regulations. 21 U.S.C. §§201(m); 202.1(k)(2).

(iii) Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS is prohibited from disseminating any information about their prices or costs of the specified pharmaceuticals that is "false or misleading in any particular . . ." 21 U.S.C. §§5.02; 302(b).

(iv) Each of the DEFENDANT PHARMACEUTICAL MANUFACTURERS was on notice that they possessed a duty to assure that their representations about prices and costs of the specified pharmaceuticals were not misleading, taking into account:

" . . . not only representations made or suggested by statement, word, design, device, or any combination thereof, but also to the extent to which the labeling or advertising fails to reveal facts material in light of such representations"

21 U.S.C. §201(n).

91. Notwithstanding the legislative intent of the Food Drug and Cosmetic Act, the Defendant Pharmaceutical Manufacturers, acting individually and in concert with one another, purposely created confusion and made false and misleading statements about pharmaceutical pricing in order to deceive the United States Government and the States' Medicaid Programs. For several years, various Governmental agencies including the HHS Office of Inspector General "OIG" and the General Accounting Office "GAO" attempted to examine the issue of the reasonableness of reimbursements by the Medicare and States'

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Medicaid Programs for many of the pharmaceuticals at issue in this Second Amended Complaint. The OIG's and GAO's efforts were thwarted, in part, by the DEFENDANT PHARMACEUTICAL MANUFACTURERS withholding and concealing pertinent information that was being sought by the OIG and GAO. The OIG and GAO attempted through numerous published reports to identify the problem of unreasonable reimbursements; however, they were unsuccessful due to the actions of the DEFENDANT PHARMACEUTICAL MANUFACTURERS. The DEFENDANT PHARMACEUTICAL MANUFACTURERS concealed and disguised the unreasonable reimbursements from the United States Government and States' Medicaid Programs, in part, by the following facts and circumstances:

A. The DEFENDANT PHARMACEUTICAL MANUFACTURERS can and do make truthful representations of price and costs for many of their pharmaceuticals sold in retail community pharmacies and, in some instances, [REDACTED], injectable [REDACTED] drugs [REDACTED] sold to physician groups, outpatient clinics and specialty infusion pharmacies.

B. Some Pharmaceutical Manufacturers (other than the DEFENDANT PHARMACEUTICAL MANUFACTURERS) make representations of costs and price only in terms of Average Wholesale Price "AWP".

C. Some of the DEFENDANT PHARMACEUTICAL MANUFACTURES make representations of cost and price only in terms of "List Price," "Wholesale Net," Direct Price "DP" or "DIRP," or Wholesaler Acquisition Costs, "WAC," to which Medical Economics and First Data Bank apply an industry average mark-up and establish an AWP.

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D. Some of the DEFENDANT PHARMACEUTICAL MANUFACTURERS
make representations of cost and price in terms of both AWP and DP (or DIRP).

92. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

93. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

94. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

98

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

95. Also, [REDACTED] price representations for [REDACTED] is another example of how States' Medicaid Programs whose reimbursement methodology is based on AWP rely upon and are defrauded by the false and fraudulent representations of direct price made by the DEFENDANT PHARMACEUTICAL MANUFACTURERS.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

96. Each DEFENDANT DRUG MANUFACTURER was on notice that it was prohibited by federal statute, from paying, or causing the payment of, directly or indirectly, money or other financial benefit to induce its customers to order the specified

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pharmaceuticals when the Medicare or States' Medicaid Programs would be paying claims.
42 U.S.C. §1320a-7(b).

97. Notwithstanding the applicable statutory requirements and prohibitions:

A. Defendants ABBOTT, [REDACTED]

[REDACTED] repeatedly, systematically and falsely represented to the Medicare and States' Medicaid Programs that the prices of certain of the generic versions of the specified drugs were the same or higher than the published price for the equivalent brand drug when they knew that, in truth and in fact, the price of their generic drug was far less than the published price of the brand and that the States' Medicaid Programs and Medicare would pay and approve claims based upon their false representations of the price of their drugs.

B. Defendants ABBOTT, [REDACTED]

[REDACTED]
[REDACTED] repeatedly, systematically and falsely represented to the Medicare and States' Medicaid Programs that the prices of certain of their specified pharmaceuticals were increasing or remaining substantially constant when they knew that in truth and in fact the prices had fallen substantially or were otherwise priced far below the represented prices and the Medicare and States' Medicaid Programs would pay and approve claims based on their false representations of the price of their pharmaceuticals.

TABLE NO. 4

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

98. The following table includes the specified drugs about which the specified Defendants falsely represented that the price of the generic version exceeded the price of the brand equivalent:

TABLE NO. 5

**THE MEDICARE AND MEDICAID PROGRAMS
DUPED INTO PAYING AS MUCH OR MORE
FOR GENERIC DRUGS THAN THEIR EQUIVALENT BRAND**

DRUG: [REDACTED]

BRAND: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

GENERIC: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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DRUG: [REDACTED]

BRAND: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

GENERIC: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

DRUG: [REDACTED]

BRAND: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

GENERIC: [REDACTED]

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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DRUG: VANCOMYCIN, HCPCS J3370

BRAND: VANCOCIN

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
■	500 mg	■	\$7.80	\$6.50
■	1 gm	■	\$15.61	\$14.13

GENERIC: VANCOMYCIN

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
Abbott	500 mg	00074-4332-01	\$31.44	\$3.51
Abbott	1 gm	00074-6533-01	\$62.86	\$7.01

DRUG: PENTAMIDINE

BRAND: PENTAM 300

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
■	300 mg	■	\$98.75	\$49.00

GENERIC: PENTAMIDINE

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
Abbott	300 mg	00074-4548-01	\$113.54	\$43.00

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DRUG: TOBRAMYCIN SULFATE, HCPCS J3260

BRAND: NEBCIN

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
██████████	40 mg/ml 80 mg	██████████	\$7.28	\$6.07

GENERIC: TOBRAMYCIN SULFATE

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
Abbott	40 mg/ml 80 mg	00074-3578-01	\$9.83	\$3.63

DRUG: AMIKACIN SULFATE

BRAND: AMIKIN

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
██████████	250 mg/ml 2 ml	██████████	\$46.99	\$13.25

GENERIC: AMIKACIN SULFATE

COMPANY	SIZE	NDC #	AWP 1996 Red Book	RELATOR'S COST
Abbott	250 mg/ml 2 ml	00074-1956-01	\$99.25	\$12.00
██████████	500 mg/ml 2 ml	██████████	\$63.75	\$14.00

**PAGE 106 THROUGH PAGE 112
WHICH INCLUDES PARAGRAPHS 99 AND 100
HAVE BEEN COMPLETELY REDACTED**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

101. The knowledge of the DEFENDANT PHARMACEUTICAL MANUFACTURERS is further demonstrated by their systematic and ongoing, written and verbal communications with customers whereby they encourage and induce them to submit claims to Medicare and Medicaid to receive the excessive payments resulting from the Defendants' false price and cost representations. Such communications are accomplished in writing as evidenced by the examples attached hereto as **Exhibit "16"** for Defendant [REDACTED] and **Exhibit "17"** for Defendant [REDACTED], **Exhibit "18"** for Defendant [REDACTED] and **Exhibit "19"** for Defendant [REDACTED]. Additionally DEFENDANTS [REDACTED] each maintain an "800" number, staffed with personnel trained to assist customers in securing payment of claims in the excessive amounts at issue in this action.

102. As an example of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' use of their false and fraudulent practices to market their products follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

103. An example of the DEFENDANT PHARMACEUTICAL MANUFACTURERS admission that their price and cost representations are false follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

SECTION NO. 8

THE SPECIFIC FALSE PRICE AND COST REPRESENTATIONS OF DEFENDANT ABBOTT

104. At various times from on or after June 23, 1989 and continuing through the present date, Defendant ABBOTT knowingly caused the Medicare program and the States' Medicaid programs throughout the United States and its territories to pay false or fraudulent claims for drugs specified in this Section No. 8 and further made or used false or fraudulent records and/or statements to get such claims paid or approved. As a result of the said actions of Defendant ABBOTT and those persons and entities acting directly or indirectly in concert with Defendant ABBOTT the Medicare and States' Medicaid Programs paid grossly excessive, unreasonable and unlawful amounts for claims for the drugs specified in this Section 8. The acts committed by Defendant ABBOTT that caused the Medicare and States' Medicaid Programs to pay or approve said false or fraudulent claims included, but were not necessarily limited to, knowingly making false or fraudulent representations about prices and costs of the drugs specified in this Section 8 which

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Defendant ABBOTT knew or should have known would be relied upon by the Medicare and States' Medicaid Programs in paying or approving claims for the drugs specified in this Section 8. Each of said representations were material and were relied upon by the Medicare and States' Medicaid Programs in paying or approving claims for the drugs specified in this Section 8.

105. Defendant ABBOTT knowingly caused its false or fraudulent price and cost representations to be published in the years specified in this Section 8 in the Red Book, the Blue Book and the First Data Banks' Automated Services and further made or used false records or statements regarding its prices and costs of the drugs specified in this Section 8 and submitted same to the Medicare and States' Medicaid Programs continuously throughout the years specified in this Section 8. For the purposes of specificity and particularity, the said false price and cost representations as they were reflected in the Red Book and Blue Book have been organized into a chart form for each drug in question and for each NDC Number assigned to each drug in question. The information provided under the columns for Defendant's Published Price, and Red Book and Blue Book "AWP" and "DP" reflects the false price and cost representations made by the Defendant ABBOTT. The information under the Relator's Cost columns reflects the true price that Defendant ABBOTT charged the Relator for the drug or caused another entity to charge the Relator for the drug. As a very small infusion pharmacy, the Relator does not always receive the lowest prices available to volume purchasers. Accordingly, a comparison of the Relator's costs with the price and cost representations made by the Defendant ABBOTT establishes the falsity of ABBOTT's representations for the drugs and years specified as follows:

CIVIL ACTION NO. 95-1354-CIV-MARCUS

a. DRUG: SODIUM CHLORIDE 0.9%
250 MLMEDICAID
NDC NO.: 00074-7983-02MEDICARE
HCPCS J7050

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$7.59	\$8.59		\$8.59	\$7.23	\$1.50	\$1.07
1994	\$7.82	\$9.01		\$9.01	\$7.59	\$1.33	\$0.95
1995	\$8.05	\$9.29		\$9.29	\$7.82	\$1.33	\$0.95
1996		\$9.56		\$9.56	\$8.05	\$1.33	\$0.95
1997		\$10.03				\$1.33	\$0.95

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Sodium Chloride:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
50 ml	00074-7101-13	-----
100 ml	00074-7101-23	-----
500 ml	00074-7983-03	J7040
1,000 ml	00074-7983-09	J7030

b. DRUG: 5% DEXTROSE IN WATER
500 MLMEDICAID
NDC NO.: 00074-7922-03MEDICARE
HCPCS J7060

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$7.71	\$8.72		\$8.72	\$7.34	\$1.80	\$0.97
1994	\$7.94	\$9.16		\$9.16	\$7.71	\$1.50	\$0.96
1995	\$8.18	\$9.43		\$9.43	\$7.94	\$1.50	\$0.96
1996		\$9.71		\$9.71	\$8.18	\$1.50	\$0.96
1997		\$10.20				\$1.50	\$0.96

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of 5% Dextrose in Water:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
50 ml	00074-7100-13	-----
100 ml	00074-7100-23	-----
250 ml	00074-7100-02	-----
1,000 ml	00074-7922-09	J7070

c. DRUG: DEXTROSE 5% WITH SODIUM CHLORIDE 0.9%
500 ML

MEDICAID
NDC NO.: 00074-7941-03

MEDICARE
HCPCS J7042

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$8.28	\$9.37		\$9.37	\$7.89	\$1.15	\$1.04
1994	\$8.53	\$9.83		\$9.83	\$8.28	\$1.15	\$1.03
1995	\$8.79	\$10.13		\$10.13	\$8.53	\$1.15	\$1.03
1996		\$10.44		\$10.44	\$8.79	\$1.15	\$1.03
1997		\$10.96				\$1.15	\$1.03

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Dextrose 5% with Sodium Chloride 0.9%:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
250 ml	00074-7941-02	-----
1,000 ml	00074-7941-09	-----

CIVIL ACTION NO. 95-1354-CIV-MARCUS

d. DRUG: RINGERS LACTATE
1,000 ML

MEDICAID

NDC NO.: 00074-7953-09

MEDICARE

HCPCS J7120

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$10.30			\$11.64	\$9.81	\$1.36	\$1.30
1994	\$10.61	\$12.23		\$12.23	\$10.30	\$1.36	\$1.14
1995	\$10.93	\$12.60		\$12.59	\$10.61	\$1.36	\$1.14
1996		\$12.98		\$12.97	\$10.93	\$1.36	\$1.14
1997		\$13.63				\$1.36	\$1.14

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Ringers Lactate:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
250 ml	00074-7953-02	-----
500 ml	00074-7953-03	-----

e. DRUG: VANCOMYCIN HCL
500 MG

MEDICAID

NDC NO.: 00074-4332-01

MEDICARE

HCPCS J3370

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$24.72	\$27.95		\$27.95	\$23.54		\$3.76
1994	\$25.46	\$29.35		\$29.36	\$24.72		\$3.51
1995	\$26.48	\$30.23		\$29.36	\$24.72	\$4.20	\$3.51
1996		\$31.44				\$3.95	\$3.51
1997						\$3.75	\$3.51

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Vancomycin HCL:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
500 mg Advantage	00074-6535-01	-----
1 gm	00074-6533-01	-----
5.0 gm	00074-6509-01	-----

f. DRUG: TOBRAMYCIN SULFATE
80 MG

MEDICAID
NDC NO.:00074-3578-01

MEDICARE
HCPCS J3260

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993		\$8.74		\$8.74	\$7.36	\$4.92	
1994		\$9.18		\$9.18	\$7.73	\$4.92	\$3.63
1995		\$9.45		\$9.45	\$7.96	\$4.92	\$3.63
1996		\$9.83		\$9.83	\$8.28	\$4.92	\$3.63
1997		\$10.32				\$4.92	\$3.63

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Tobramycin Sulfate:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
20 mg	00074-3577-01	-----
60 mg	00074-3582-01	-----
60 mg	00074-3469-13	-----
60 mg	00074-3254-03	-----

SIZE	MEDICAID NDC#	MEDICARE HCPCS
80 mg	00074-3255-03	-----
80 mg	00074-3470-23	-----
80 mg	00074-3583-01	-----
2,000 mg	00074-3590-02	-----

g. DRUG: PENTAMIDINE ISETHIONATE
300 MG

MEDICAID
NDC NO.: 00074-4548-01

MEDICARE
HCPCS

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$89.25	\$85.00		\$100.94	\$85.00	\$75.00	
1994	\$91.93	\$105.98		\$105.98	\$89.25		
1995	\$95.61	\$109.17		\$109.17	\$91.93	\$59.00	\$43.00
1996		\$113.54		\$113.54	\$95.61		\$43.00
1997		\$119.21					

h. DRUG: CLINDAMYCIN PHOSPHATE
900 MG

MEDICAID
NDC NO.: 00074-4052-01

MEDICARE

YEAR	DEFENDANT'S PUBLISHED PRICE	RED BOOK		BLUE BOOK		RELATOR'S WHOLESALE COST	RELATOR'S DIRECT COST
		"AWP"	"DP"	"AWP"	"DP"		
1993	\$20.62	\$23.32		\$23.32	\$19.64	\$3.25	\$7.25
1994	\$21.24	\$24.49		\$24.49	\$20.62	\$3.25	\$3.20
1995	\$22.09	\$25.22		\$25.22	\$21.24	\$3.25	\$3.20
1996		\$26.23		\$26.23	\$22.09	\$3.25	\$3.20
1997		\$27.54				\$3.25	\$3.20

Defendant, ABBOTT caused the payment or approval of false or fraudulent claims during the years specified in the above chart by the Medicare and/or States' Medicaid Programs for the following additional size(s) of Clindamycin Phosphate:

SIZE	MEDICAID NDC#	MEDICARE HCPCS
300 mg	00074-4053-03	-----
300 mg	00074-4050-01	-----
600 mg	00074-4054-03	-----
600 mg	00074-4051-01	-----
9,000 mg	00074-4197-01	-----

As a direct and proximate result of the actions of the Defendant ABBOTT alleged herein, the United States has sustained damages recoverable under the False Claims Act, together with triple damages, penalties, attorneys' fees and costs.

SECTION NO. 9

THE SPECIFIC FALSE PRICE AND COST REPRESENTATIONS OF DEFENDANT

106. [REDACTED]

**PAGES 124 THROUGH 208
HAVE BEEN COMPLETELY REDACTED
WHICH INCLUDES THE END OF
PARAGRAPH 106
THROUGH PARAGRAPH 147**

As a direct and proximate result of the actions of the Defendant [REDACTED] alleged herein, the United States has sustained damages recoverable under the False Claims Act, together with triple damages, penalties, attorneys' fees and costs.

COUNT I

**FALSE CLAIMS ACT;
CAUSING PRESENTATION OF FALSE OR FRAUDULENT CLAIMS**

148. This is a civil action by the Plaintiff, UNITED STATES, and the Relator, VEN-A-CARE, on behalf of the UNITED STATES, against the Defendants, ABBOTT LABORATORIES; [REDACTED]

§§3729-3732.

149. Relator realleges and incorporates by reference paragraphs 1 through 147 as if fully set forth herein and further alleges as follows:

CIVIL ACTION NO. 95-1354-CIV-MARCUS

150. The DEFENDANT PHARMACEUTICAL MANUFACTURERS from a date on or before June 23, 1989 to the present date, knowingly [as defined in 31 USC, §3729(b)] caused to be presented to officers or employees of the UNITED STATES GOVERNMENT false or fraudulent claims [as explained in United States v. Neifert-White, 390 US 228, 232-233 (1968)] for payment or approval, in that the DEFENDANT PHARMACEUTICAL MANUFACTURERS caused to be presented to officers or employees of the UNITED STATES GOVERNMENT false or fraudulent price and cost information for the pharmaceuticals specified herein and caused the UNITED STATES to pay out sums of money to the providers and suppliers of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' specified pharmaceuticals, grossly in excess of the amounts permitted by law, resulting in great financial loss to the UNITED STATES.

151. Because of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' conduct as set forth in this Count, the UNITED STATES suffered actual damages in excess of Ten (10) Billion Dollars (\$10,000,000,000.00), all in violation of **31 U.S.C. §3729(a)(1)**

COUNT II**FALSE CLAIMS ACT; CAUSING A FALSE RECORD OR STATEMENT
TO BE MADE OR USED TO GET A FALSE OR FRAUDULENT
CLAIM PAID OR APPROVED BY THE GOVERNMENT**

152. This is a civil action by the Plaintiff, UNITED STATES, and the Relator, VEN-A-CARE, on behalf of the UNITED STATES, against the Defendants, ABBOTT LABORATORIES; [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] under the **False Claims Act, 31 U.S.C. §§3729-3732.**

153. Relator realleges and incorporates by reference paragraphs 1 through 147 as if fully set forth herein and further alleges as follows:

154. The DEFENDANT PHARMACEUTICAL MANUFACTURERS, from a date on or before June 23, 1989 to the present date, knowingly [as defined in **§3729(b)**] caused false records or statements to be made or used to get false or fraudulent claims [as explained in United States v. Neifert-White, 390 US 228, 232-233 (1968)] to be paid or approved by the GOVERNMENT, in that the DEFENDANT PHARMACEUTICAL MANUFACTURERS, caused false records or statements of prices and costs of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' pharmaceuticals specified herein to be used by the GOVERNMENT to pay or approve claims presented by the providers and suppliers of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' specified pharmaceuticals, which claims were grossly in excess of the amounts permitted by law, resulting in great financial loss to the UNITED STATES.

155. Because of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' conduct as set forth in this Count, the UNITED STATES suffered actual damages in excess of Ten Billion Dollars (\$10,000,000,000.00), all in violation of **31 U.S.C. §3729(a)(2)**.

COUNT III

**FALSE CLAIMS ACT; CAUSING FALSE RECORDS OR
STATEMENTS TO BE USED TO CONCEAL AN OBLIGATION
TO PAY MONEY TO THE GOVERNMENT**

156. This is a civil action by the Plaintiff, UNITED STATES, and the Relator, VEN-A-CARE, on behalf of the UNITED STATES, against the Defendants, ABBOTT LABORATORIES; [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] under the **False Claims Act, 31 U.S.C. §§3729-3732**.

157. Relator realleges and incorporates by reference paragraphs 1 through 147 as if fully set forth herein and further alleges as follows:

158. The DEFENDANT PHARMACEUTICAL MANUFACTURERS, from a date on or before June 23, 1989 to the present date, knowingly [as defined in §3729(b)] caused false records or statements to be made or used to conceal obligations to pay money to the GOVERNMENT, in that: the DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that the UNITED STATES' Medicare program and the States' Medicaid programs were using the DEFENDANT PHARMACEUTICAL MANUFACTURERS' false price and cost representations for purposes of paying or approving claims of the providers and suppliers of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' specified pharmaceuticals; the DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that sums of money paid by the UNITED STATES and States' Governments to the providers and suppliers of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' specified pharmaceuticals were grossly in excess of the amounts permitted by law; the DEFENDANT PHARMACEUTICAL MANUFACTURERS knew it was the obligation of the UNITED STATES Medicare Part B carriers and State Governments to recoup governments' funds paid in excess of the amounts permitted by law; the DEFENDANT PHARMACEUTICAL MANUFACTURERS, nevertheless, continued to cause the using and making of false records or statements of prices and costs for the specified pharmaceuticals that were grossly in excess of the reasonable amounts permitted by law; and the DEFENDANT PHARMACEUTICAL MANUFACTURERS thus concealed from the UNITED STATES Medicare Part B carriers and State Governments an obligation of the providers and suppliers of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' specified pharmaceuticals to pay recoupment monies to the UNITED STATES and State Governments, resulting in great financial loss to the UNITED STATES and State Governments.

COUNT IV

[illegible]

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162. The DEFENDANT PHARMACEUTICAL MANUFACTURERS, from on or about June 23, 1989 to the present date, knew that the prices charged to their customers for the specified pharmaceuticals were significantly reduced in amount from the prices and costs represented by the DEFENDANT PHARMACEUTICAL MANUFACTURERS and upon which the Defendants knew Medicare and Medicaid claims would be approved and paid. Accordingly, the DEFENDANT PHARMACEUTICAL MANUFACTURERS have each knowingly offered or paid, or caused to be offered or paid, directly or indirectly, overtly or covertly, in cash or in kind, remuneration to their customers in the form of price reductions and/or in the form of illegal remuneration from the Medicare and/or States' Medicaid Programs to induce them to purchase, order or arrange or to recommend purchasing, arranging or ordering the specified pharmaceuticals for which the DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that payment would be made, in whole or in part, by the Medicare and States' Medicaid Programs. Such financial inducement is specifically prohibited by 42 U.S.C. §1320a-7b(b)(2) and 18 U.S.C §2.

163. The DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that the Medicare and States' Medicaid Programs would not pay or approve claims for the specified pharmaceuticals if it were disclosed to the Medicare and States' Medicaid Programs that said claims were for amounts that included remuneration prohibited by 42 U.S.C. §1320a-7b(b)(2).

164. The DEFENDANT PHARMACEUTICAL MANUFACTURERS also knew that their customers, in presenting claims for the specified pharmaceuticals to the Medicare and States' Medicaid Programs, would not and did not disclose that the claim amounts included the remuneration prohibited by 42 U.S.C. §1320a-7b(b)(2).

165. The DEFENDANT PHARMACEUTICAL MANUFACTURERS' knowing and willful actions in arranging for their customers to receive remuneration prohibited by 42 U.S.C. §1320a-7b(b)(2), in causing the omission of material information from the claims, and in causing the failure to properly disclose and appropriately reflect the remuneration in the claims, caused the claims for the specified pharmaceuticals to be false and fraudulent claims and caused the claims to be presented to the Medicare and States' Medicaid Programs for payment and approval in violation of 31 U.S.C §3729(a)(1).

166. Because of the DEFENDANT PHARMACEUTICAL MANUFACTURERS' conduct as set forth in this Count, the UNITED STATES suffered actual damages in excess of Ten Billion Dollars (\$10,000,000,000.00) all in violation of 31 U.S.C. §3729(a)(1).

COUNT V

**FALSE CLAIMS ACT; CAUSING A FALSE RECORD OR
STATEMENT TO BE MADE OR USED TO GET
A FALSE OR FRAUDULENT CLAIM PAID OR APPROVED BY THE
GOVERNMENT; ILLEGAL REMUNERATIONS**

167. This is a civil action by the Plaintiff, UNITED STATES, and the Relator, VEN-A-CARE, on behalf of the UNITED STATES, against the Defendants, ABBOTT LABORATORIES; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] under the **False Claims Act, 31 U.S.C.**
§§3729-3732.

168. Relator realleges and incorporates by reference paragraphs 1 through 147 as if fully set forth herein and further alleges as follows:

169. The DEFENDANT PHARMACEUTICAL MANUFACTURERS, from on or before June 23, 1989 to the present date, knew that the prices charged to their customers for the specified pharmaceuticals were significantly reduced in amount from the prices and costs represented by the DEFENDANT PHARMACEUTICAL MANUFACTURERS and upon which the Defendants knew Medicare and Medicaid claims would be approved and paid. Accordingly, the DEFENDANT PHARMACEUTICAL MANUFACTURERS have each knowingly offered or paid, or caused to be offered or paid, directly or indirectly, overtly or covertly, in cash or in kind, remuneration to their customers in the form of price reductions and/or in the form of illegal remuneration from the Medicare and/or States' Medicaid Programs to induce them to purchase, order or arrange or to recommend purchasing, arranging or ordering the specified pharmaceuticals for which the DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that payment would be made, in whole or in part, by the Medicare and States' Medicaid Programs. Such financial inducement is specifically prohibited by 42 U.S.C. §1320a-7b(b)(2) and 18 U.S.C §2.

170. The DEFENDANT PHARMACEUTICAL MANUFACTURERS knew that the Medicare and States' Medicaid Programs would not pay or approve claims for the specified

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] with judgment to be entered against each defendant for the amount of damages: (1) to the States' Medicaid Programs arising from claims for each Defendant's respective specified pharmaceuticals; and (2) to the Medicare Program arising from claims for those pharmaceuticals classified under the HCPCS codes covering their specified pharmaceuticals, jointly and severally with such other defendants whose pharmaceuticals fall under said HCPCS codes, as follows:

1. On Count I (False Claims Act; Causing Presentation of False Claims) for triple the amount of the UNITED STATES' damages, plus civil penalties of no more than TEN THOUSAND DOLLARS (\$10,000.00) and no less than FIVE THOUSAND DOLLARS (\$5,000.00) for each false claim;

2. On Count II (False Claims Act; Causing False Statements To Be Used To Get False Claims Paid By The GOVERNMENT) for triple the amount of UNITED STATES' damages plus civil penalties of no more than TEN THOUSAND DOLLARS (\$10,000.00) and no less than FIVE THOUSAND DOLLARS (\$5,000.00) for each false statement;

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3. On Count III (False Claims Act; causing False Statements To Be Used To conceal An Obligation To Pay Money To The GOVERNMENT) for triple the amount of the UNITED STATES' damages plus civil penalties of no more than TEN THOUSAND DOLLARS (\$10,000.00) and no less than FIVE THOUSAND DOLLARS (\$5,000.00) for each false or fraudulent claim paid;

4. On Count IV (False Claims Act; Causing Presentation of False and Fraudulent Claims; Illegal Remunerations) for triple the amount of the UNITED STATES' damages, plus civil penalties of no more than TEN THOUSAND DOLLARS (\$10,000.00) and no less than FIVE THOUSAND DOLLARS (\$5,000.00) for each false claim;

5. On Count V (False Claims Act; Causing A False Record Or Statement To Be Made Or Used To Get A False Or Fraudulent Claim Paid Or Approved by the Government; Illegal Remunerations) for triple the amount of UNITED STATES' damages plus civil penalties of no more than TEN THOUSAND DOLLARS (\$10,000.00) and no less than FIVE THOUSAND DOLLARS (\$5,000.00) for each false statement;

6. For all fees and costs of this civil action; and

7. For such other and further relief as the Court deems just and equitable.

Further, the Relator, on its behalf, requests that it receive thirty percent (30%), or such other maximum amount as permitted by law, of the proceeds of this action or settlement of this action collected by the UNITED STATES, plus an amount for reasonable expenses incurred, plus reasonable attorneys' fees and costs of this action. The Relator requests that its percentage be based upon the total value recovered, including any amounts received from individuals or entities not parties to this action.

CIVIL ACTION NO. 95-1354-CIV-MARCUS

DEMAND FOR JURY TRIAL

A jury trial is demanded in this case.

Respectfully submitted,

Atlee W. Wampler III

Atlee W. Wampler, III
Florida Bar No. 311227

James J. Breen

James J. Breen
Florida Bar No. 297178
WAMPLER, BUCHANAN & BREEN, P.A.
900 Sun Bank Building
777 Brickell Avenue
Miami, Florida 33131
Telephone: (305) 577-0044
Facsimile: (305) 577-8545

CERTIFICATE OF SERVICE

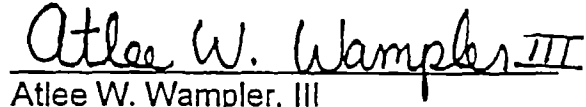
I HEREBY CERTIFY that on this _____ day of August, 1997, I caused an original and a copy of this Second Amended Complaint to be filed under seal and in camera for sixty (60) days and not to be served on the Defendants named herein or until further order of this Honorable Court.

I HEREBY CERTIFY that prior to this 12th day of August, 1997, I caused a copy of this Second Amended Complaint and written disclosure of substantially all material evidence and information the Relator, VEN-A-CARE possesses to be served on the Government pursuant to Rule 4(i), Fed.R.Civ.P., prior to the filing of this Second Amended Complaint by delivering a copy of the Summons, Second Amended Complaint, material evidence and information to the United States Attorney for the Southern District of Florida, and by sending a copy of the Summons, Second Amended Complaint, material evidence

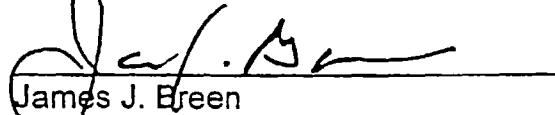
CIVIL ACTION NO. 95-1354-CIV-MARCUS

and information by Certified Mail, Return Receipt Requested, to the Attorney General of the United States in Washington, D.C.

Respectfully submitted,



Atlee W. Wampler, III
Florida Bar No. 311227



James J. Breen
Florida Bar No. 297178
WAMPLER, BUCHANAN & BREEN, P.A.
900 Sun Bank Building
777 Brickell Avenue
Miami, Florida 33131
Telephone: (305) 577-0044
Facsimile: (305) 577-8545

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ABBOTT
Alternate Site
Product Sales

High Tech Products for Alternate Site and Home Health Care

Mr. Michael Fabrizi
 Division Vice President
 Automated Health Technologies
 1025 NW 17th Avenue
 Delray Beach, FL 33445

February 14, 1997

Dear Michael,

Abbott Laboratories is pleased to announce that we will be adding two new product lines to our family of FirstChoice® Injectable Drugs.

Early in the 2nd quarter of 1997 we will offer Acyclovir and Cefuroxime Sodium available as high quality, cost-cutting generics. Acyclovir will be available in two strengths, 500 mg and 1 gram vials (as is Glaxo's Zovirax). Cefuroxime Sodium will be available in five strengths, as is Glaxo's Zinacef, Lilly's Kefurox or Marsam's generic version.

Upon introduction, we anticipate a great demand for these products. We are therefore offering our valued customers with existing contracts, the opportunity to ensure that your orders get first priority. By signing this letter of understanding, the products will be added to your contract and you will get *early sign-up pricing*. You will also get our commitment to meet or beat any written competitive offer or we will remove the product from your contract.

The pricing will be as follows:

<u>List Number</u>	<u>NDC Number</u>	<u>Product Description</u>	<u>Invoice Each Price</u>
04427-01-01	00074-4427-01	Acyclovir 500 mg Vial	\$35.00 / vial
04452-01-01	00074-4452-01	Acyclovir 1 gram Vial	\$70.00 / vial
HO125-04-04	10515-125-04	Cefuroxime 15 mg / mL 100 mL	\$6.65 / vial
HO125-03-03	10515-125-03	Cefuroxime 7.5 mg / mL 100 mL	\$3.45 / vial
HO125-01-01	10515-125-01	Cefuroxime 75 mg / mL 10 mL	\$3.20 / vial
HO124-05-05	10515-124-05	Cefuroxime 75 mg / mL 100 mL	\$31.20 / vial
HO125-02-02	10515-125-02	Cefuroxime 75 mg / mL 20 mL	\$6.40 / vial

To accept the above terms, please sign below and return to my attention. Thank you in advance for your consideration.

Best regards,

Donnis M. Walker

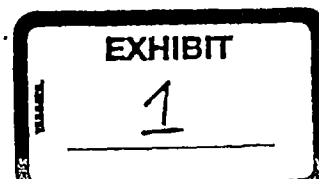
Donnis M. Walker
 Manager, National Accounts

Accepted By: *[Signature]*

Title: *VP*

Date: *2/24/97*

200 Abbott Park Road • Abbott Park, IL 60064-3537



VEN-A-CARE/CRITI-CA
MAY. 30. 1997 2:32PM

1 1-305-292-1739
JTT ALTERNATE SITE PROD. SALES

Jun 1 97 16:42 No.006 P.03
NO. 8566 P. 1/1

Facsimile Cover Sheet

To: Zack

Company: Venacare Pharmacy

Phone: (305) 292-1635

Fax: (305) 292-1739

From: Dennis M. Walker

Company: Abbott Alternate Site Product Sales

Phone: (847) 938-1413

Fax: (847) 938-1084

Date: 5/30/97

**Pages including this
cover page: 1**

Comments: Listed below is your Automated Health Technologies price for Acyclovir and the A.W.P. information you requested. Please call if you have any questions.

<u>List #</u>	<u>Product Description</u>	<u>Price Each</u>	<u>A.W.P. Each</u>
4427-01	Acyclovir 500 mg	\$30.00	\$ 95.00
4452-01	Acyclovir 1 gm	\$60.00	\$190.00



JUNE 1997

RED BOOK UPDATE SUMMARY RX CHANGES - BY COMPANY

9/MCNEI

PROD. MFR	NDC	AWP	DP	SEC
3M PHARM				
ALDARA				
CRE, TP (PACKETS)				
5%, 0.250 gm 12s	00889-0610-12	108.00		
ABBOTT BOSP				
ACYCLOVIR SODIUM (eff. 04/23/97)				
PDI, LI (VIAL, FLIPTOP)				
500 mg, 10s ea	00874-4427-01	950.00	800.00	
1000 mg, 10s ea	00874-4452-01	1900.00	1600.00	
MORPHINE SULFATE (eff. 04/07/97)				
MLI, LI (AMP, P.F.)				
0.5 mg/ml				
10 ml 5s, C-II	00874-4857-12	68.46	57.65	AP
(VIAL, P.F., FLIPTOP)				
0.5 mg/ml				
10 ml 5s, C-II	00874-3814-12	75.29	63.40	AP
30 ml 10s, C-II	00874-2828-02	160.67	135.30	AP
(AMP, P.F.)				
1 mg/ml				
10 ml 5s, C-II	00874-0858-12	73.83	61.50	AP
(VIAL, P.F., FLIPTOP)				
1 mg/ml				
10 ml 5s, C-II	00874-3815-12	80.22	67.55	AP
30 ml 10s, C-II	00874-2829-02	207.22	174.50	AP
(VIAL, FLIPTOP)				
1 mg/ml				
30 ml 10s, C-II	00874-6823-04	179.43	151.10	AP
ABBOTT PHARM				
K-TAB (eff. 05/06/97)				
TER, PO, 10 mg, 100s ea	00874-7894-13	37.55	31.62	BC
1000s ea	00874-7894-19	356.85	300.50	BC
PCE DISPERTAB (eff. 05/06/97)				
TCP, PO, 333 mg, 60s ea	00874-8290-68	77.54	65.29	
500 mg, 100s ea	00874-3389-13	170.41	143.50	
ALPHARMA USP				
ACYCLOVIR				
SUS, PO, 200 mg/5 ml				
480 ml	00472-0082-16	83.26		AB
ALZA				
ETHYOL				
POL LI (S.O.V., MANNITOL-FREE)				
500 mg, ea	17314-7253-01	322.92	269.10	
3s ea	17314-7253-03	968.76	807.30	

PROD. MFR	NDC	AWP	DP	SEC
EDM				
ETODOLAC				
TAB, PO, 400 mg, 100s ea	00185-0140-01	125.59		AB
500s ea	00185-0140-05	596.55		AB
1000s ea	00185-0140-10	1130.31		AB
ESI LENSEN GENERICS				
ACYCLOVIR				
CAP, PO, 200 mg, 100s ea	59911-5831-03	97.70		EE
TAB, PO, 400 mg, 100s ea	59911-3163-04	189.61		EE
800 mg, 100s ea	59911-3164-04	368.70		EE
FUJISAWA				
PROGRAF (eff. 05/01/97)				
CAP, PO, 1 mg, 100s ea	00489-0617-71	239.40		
5 mg, 100s ea	00489-0657-71	1197.00		
MLI, LI (AMP)				
5 mg/ml, 1 ml 10s	00489-3016-01	222.00		
GALDERMA				
BENZAC AC (eff. 05/01/97)				
GEL, TP, 2.5%, 60 gm	00299-3628-68	14.06		
90 gm	00299-3628-90	16.88		
5%, 60 gm	00299-3625-68	14.56		
90 gm	00299-3625-90	19.00		
10%, 60 gm	00299-3630-60	14.94		
90 gm	00299-3630-90	19.81		
LIQ, TP, 2.5%, 240 ml	00299-3633-08	19.69		
5%, 240 ml	00299-3640-08	22.31		
10%, 240 ml	00299-3645-08	24.56		
BENZAC W (eff. 05/01/97)				
GEL, TP, 2.5%, 60 gm	00299-3590-60	13.75		
90 gm	00299-3590-90	16.50		
5%, 60 gm	00299-3600-01	14.19		
90 gm	00299-3600-09	18.50		
10%, 60 gm	00299-3610-01	14.81		
90 gm	00299-3610-09	19.50		
LIQ, TP, 5%, 120 ml	00299-3670-04	12.81		
240 ml	00299-3670-08	19.13		
10%, 240 ml	00299-3672-08	21.63		
DESOWEN (eff. 05/01/97)				
CRE, TP, 0.05%, 15 gm	00299-5770-15	14.31		AB
60 gm	00299-5770-60	36.88		AB
LOT, TP, 0.05%, 60 ml	00299-5765-02	24.69		
120 ml	00299-5765-04	36.44		

PROD. MFR	NDC	AWP	DP	SEC
DILAUDID (eff. 09/20/96)				
INJ, LI (AMP)				
1 mg/ml				
1 ml 10s, C-II	00044-1011-01	11.70	9.36	
2 mg/ml				
1 ml 10s, C-II	00044-1012-01	12.91	10.33	
1 ml 25s, C-II	00044-1012-09	30.73	24.58	
(VIAL)				
2 mg/ml, 20 ml, C-II	00044-1062-05	19.90	15.92	
(AMP)				
4 mg/ml				
1 ml 10s, C-II	00044-1014-01	15.63	12.50	
SUP, RC, 3 mg, 6s ea, C-II	00044-1053-01	20.45	16.36	
TAB, PO, 2 mg				
100s ea, C-II	00044-1022-02	42.10	33.68	
500s ea, C-II	00044-1022-03	189.30	159.44	
4 mg				
100s ea, C-II	00044-1024-02	68.71	54.97	
500s ea, C-II	00044-1024-03	327.28	261.82	
8 mg				
100s ea, C-II	00044-1028-02	125.06	100.05	
DILAUDID-HIP (eff. 02/19/96)				
INJ, LI (S.O.V.)				
10 mg/ml, 50 ml, C-II	00044-1017-06	150.46	126.70	AP
E-MYCIN (eff. 09/20/96)				
ECT, PO (UNIT OF USE)				
250 mg, 40s ea	00044-0207-09	10.73	5.23	AB
100s ea	00044-0207-01	27.26	9.36	AB
500s ea	00044-0207-05	130.23	45.08	AB
333 mg, 100s ea	00044-0208-01	47.08	26.89	AB
500s ea	00044-0208-05	218.93	120.27	AB
IBU (eff. 10/24/95)				
TAB, PO, 400 mg, 100s ea	00044-0165-01	12.35	3.40	AB
500s ea	00044-0165-05	49.35	15.25	AB
600 mg, 100s ea	00044-0162-01	16.70	4.45	AB
500s ea	00044-0162-05	72.15	20.00	AB
800 mg, 100s ea	00044-0173-01	23.05	6.80	AB
500s ea	00044-0173-05	104.10	30.60	AB
ISOPTIX (eff. 10/24/95)				
TAB, PO, 40 mg, 100s ea	00044-1821-02	30.74	25.62	AB
80 mg, 100s ea	00044-1822-02	44.72	36.85	AB
500s ea	00044-1822-05	212.16	176.80	AB
1000s ea	00044-1822-04	406.69	338.91	AB
120 mg, 100s ea	00044-1823-02	59.80	49.83	AB
500s ea	00044-1823-05	287.05	239.21	AB
1000s ea	00044-1823-04	550.19	458.49	AB

EXHIBIT "5"
THROUGH
EXHIBIT "7"
HAVE BEEN COMPLETELY
REDACTED

VEN-A-CARE/CRITI-CA

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1-305-292-1739

Jul 17 7

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02/13/97 THU 11:57 FAX 703

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Pharmacy Payment and Patient Cost Sharing

State	Dispensing Fee	Ingredient Reimbursement Basis	Generic
Alabama	\$3.45	AWP-5%	\$0.50-\$2.00
Alaska	\$3.45-\$11.46	AWP-5%	\$2.00
Arizona	-	-	-
Arkansas	\$4.51 + 0.103(BAC)	AWP-10.5%	\$0.50-\$3.00
California	\$4.05	AWP-5%	No
Colorado	\$4.08	AWP-10%; WAC+18%	G: \$0.50, B: \$2.00
Connecticut	\$4.10	AWP-12%	No
Delaware	\$3.65	AAC	No
District of Columbia	\$4.50	AWP-10%	\$0.50
Florida	\$4.23	WAC+7%	No
Georgia	\$4.41-\$15.00	AWP-10%	\$0.50
Hawaii	\$4.67	AWP-10.5%	No
Idaho	\$4.41	AWP	No
Illinois	\$3.30-\$15.00	AWP-10%; multisource drugs are AWP-12%	No
Indiana	\$4.00	AWP-10%	\$0.50-\$3.00
Iowa	\$4.02-\$6.25	AWP-10%	\$1.00
Kansas	\$2.52-\$6.71	AWP-10%	\$2.00
Kentucky	OP: \$4.75, LTC: \$5.75	AWP-10%	No
Louisiana	\$5.77	AWP-10.5%	\$0.50-\$3.00
Maine	\$3.35-\$5.35	AWP-10%	\$0.50-\$3.00
Maryland	\$4.66	WAC+10%	\$1.00
Massachusetts	\$3.00	WAC+10%	\$0.50
Michigan	\$3.72	AWP-13.5% or AWP-15.1%	\$1.00
Minnesota	\$4.10	AWP-9%	No
Mississippi	\$4.91	AWP-10%	\$1.00
Missouri	\$4.09	AWP-10.43%	\$0.50-\$2.00
Montana	\$2.00-4.08	AWP-10%	G: \$1.00, B: \$2.00
Nebraska	\$2.84-5.05	AWP-8.71%	\$1.00
Nevada	\$4.64	AWP-10%	No
New Hampshire	\$2.50	AWP-12%	\$0.50-\$1.00
New Jersey	\$3.73-\$4.07	AWP-2.8%	No
New Mexico	\$4.00	AWP-10.5%	No
New York	G: \$5.50, B: \$4.50	AWP-10%	G: \$0.50, B: \$2.00
North Carolina	\$5.60	AWP-10%	\$1.00
North Dakota	\$4.90	AWP-10%	No
Ohio	\$3.50	AWP-7.5%	No
Oklahoma	\$4.15	AWP-10.5%	\$1.00-\$2.00
Oregon	\$3.80-\$4.16	AWP-11%	No
Pennsylvania	\$4.00	AWP-10%	\$1.00
Rhode Island	\$2.85-\$3.40	WAC+5%	No
South Carolina	\$4.05	AWP-10%	\$1.50
South Dakota	\$4.75-\$5.55	AWP-10.5%	\$2.00
Tennessee	Not Avail.	Not Avail.	Not Avail.
Texas	\$4.55	AWP-10.49%; WAC+12%	No
Utah	\$3.90 urban; \$4.40 rural	AWP-12%	No
Vermont	\$4.25	AWP-10%	\$1.00-\$2.00
Virginia	\$4.25	AWP-9%	\$1.00
Washington	\$3.72-\$4.59	AWP-11%	No
West Virginia	\$3.90	AWP-12%	\$0.50-\$2.00
Wisconsin	4.69-6.67	AWP or AWP-10%	\$0.50-\$1.00
Wyoming	\$4.70	AWP-4%	\$1.00

*Actual Acquisition Cost (AAC) for injectables, vaccines, biologicals, etc.

WAC = Wholesaler Acquisition Cost; AWP = Average Wholesale Price; BAC = Estimated Acquisition Price;

G = Generic; B = Brand name; OP = Outpatient; LTC = Long Term Care.

Source: As reported by state drug program administrators in the NPC Survey.

EXHIBIT

8

EXHIBIT “9”

THROUGH

EXHIBIT “14”

HAVE BEEN COMPLETELY

REDACTED

JULY 1997

RED BOOK UPDATE SUMMARY RX CHANGES - BY COMPANY

7/GALDE

PROD./MFR	UNIT/DOSE	AMOUNT	DATE
ABBOTT NOB			
KETOROLAC TROMETHAMINE			
INJ. 10 (ABSOJECT-PA)			
15 mg/ml, 1 ml 10s	80074-3323-02	94.28	78.40
(VIAL, 10/10)			
15 mg/ml, 1 ml 25s	80074-3793-01	108.22	132.50
(ABSOJECT-PA)			
30 mg/ml, 1 ml 10s	80074-2988-02	68.56	83.00
(VIAL, FLUPTOP)			
30 mg/ml, 1 ml 25s	80074-3783-01	197.72	188.50
(ABSOJECT-PA)			
30 mg/ml, 2 ml 10s	80074-2938-02	104.74	84.20
(VIAL, FLUPTOP)			
30 mg/ml, 2 ml 25s	80074-8786-01	207.62	174.78
ABBOTT PHARM			
DEPAKOT			
INJ. 10 (S.D.V.)			
100 mg/ml & 10s	80074-1684-18	60.00	72.00
ALLERGAN INC			
ACULAR (IN. 06/11/97)			
SOL. OP. 0.5%, 5 ml	80023-2181-03	21.03	
5 ml	80023-2181-05	35.33	
10 ml	80023-2181-10	65.85	
ALPHAGAN (IN. 06/11/97)			
SOL. OP. 0.2%, 5 ml	80023-8965-05	22.85	
10 ml	80023-8965-10	45.29	
BLEPHAMIDE (IN. 06/11/97)			
SUS. OP. 0.2%-10%, 3 ml	11949-0823-03	19.88	
10 ml	11949-0823-10	69.18	
ELMITE (IN. 06/11/97)			
CRE. TP. 3%, 50 gm	80023-7816-08	23.23	
FML (MOUSUM (IN. 06/11/97)			
SUS. OP. 0.1%, 1 ml	11949-0211-01	6.90	AA
10 ml	11949-0211-10	31.16	AA
15 ml	11949-0211-15	43.89	AA
BRIS-PED (IN. 06/11/97)			
TAB. PO. 125 mg, 1000 ea	80023-8783-04	32.18	AA
250 mg, 1000 ea	80023-8773-04	88.25	AA
5000 ea	80023-8773-08	462.81	AA
MAFIRIN (IN. 06/11/97)			
CRE. TP. 1%, 15 gm	80023-4128-15	17.63	
30 gm	80023-4128-28	29.41	
60 gm	80023-4128-58	45.84	
DEL TP. 1%, 20 gm			
40 gm	80023-4779-48	23.80	
60 gm	80023-4779-68	46.41	
DCUPLEX (IN. 06/11/97)			
SOL. OP. 0.3%, 6 ml	11949-8776-04	24.13	
10 ml	11949-8776-10	41.25	
PRED FORTE (IN. 06/11/97)			
SUS. OP. 1%, 10 ml	11949-8180-18	31.34	AA
15 ml	11949-8180-15	45.40	AA
APOTHECON			
CHOLESTYRAMINE			
PDR. PO. (5 GM PACKETS)			
4 gm/8 gm, 604 ea	80772-8665-01	74.33	62.50 AA
CHOLESTYRAMINE LIGHT			
PDR. PO. (5 GM PACKETS)			
4 gm/8 gm, 604 ea	80772-8668-01	74.33	82.50 AA
B/M EQUINE U.S. PHAR			
CEZIL (IN. 06/09/97)			
PDR. PO. 125 mg/5 ml			
50 ml	80087-7718-40	14.96	13.08
75 ml	80087-7718-62	22.32	19.61
100 ml	80087-7718-84	29.72	25.96
250 mg/5 ml, 50 ml	80087-7718-40	27.25	24.24
75 ml	80087-7718-62	40.78	35.63
100 ml	80087-7718-84	53.84	47.04
TAB. PO. 250 mg, 1000 ea	80087-7728-08	311.02	271.89
500 mg, 80 ea	80087-7721-08	303.88	265.28
1000 ea	80087-7721-48	388.07	623.32
DURICEF (IN. 06/09/97)			
CAP. PO. 500 mg, 20s ea	80087-8784-07	77.41	87.82 AA
50s ea	80087-8784-46	189.67	185.82 AA
100s ea	80087-8784-42	358.75	314.26 AA
PDR. PO. 125 mg/5 ml			
50 ml	80087-8788-42	7.32	6.63 AA
100 ml	80087-8788-41	14.39	12.57 AA
250 mg/5 ml, 50 ml	80087-8782-42	12.78	12.04 AA
100 ml	80087-8782-41	27.04	23.52 AA
500 mg/5 ml, 50 ml	80087-8782-41	18.70	16.24 AA
75 ml	80087-8782-88	28.05	24.51 AA
100 ml	80087-8783-41	37.43	32.89 AA
TAB. PO. 1 gm, 50s ea	80087-8785-43	354.90	311.77 AA
100s ea	80087-8785-42	643.50	597.07 AA
EXTRACT (IN. 06/09/97)			
CRE. VS (W/APPLICATOR)			
0.1 mg/gm, 42.500 gm	80087-8784-42	30.47	26.82
TAB. PO. 0.5 mg, 1000 ea	80087-8821-41	29.26	24.83 AA
1 mg, 1000 ea	80087-8785-41	38.97	34.04 AA
500s ea	80087-8785-40	183.14	181.73 AA
2 mg, 1000 ea	80087-8785-41	56.80	49.71 AA
500s ea	80087-8785-40	270.26	236.06 AA
MONOPRIL (IN. 06/09/97)			
TAB. PO. 10 mg, 30s ea	80087-8183-22	24.87	21.73
30s ea	80087-8183-44	74.59	65.16
1000s ea	80087-8183-44	878.98	724.14
20 mg, 30s ea	80087-8689-31	24.87	21.73

PROD./MFR	UNIT/DOSE	AMOUNT	DATE
80s ea			
1000s ea	80087-8689-42	74.58	66.16
40 mg, 30s ea	80087-8689-42	828.98	724.14
80s ea	80087-1282-33	24.87	21.73
1000s ea	80087-1282-33	74.58	66.16
SYCON 88 (IN. 06/09/97)			
TAB. PO. (21X8)			
25 mg/0.4 mg, 128s ea	80087-8689-42	168.38	145.33
25 mg/0.4 mg, 128s ea	80087-8689-41	168.38	145.33
SYCON 88 (IN. 06/09/97)			
TAB. PO. (21X8)			
60 mg/1 mg, 128s ea	80087-8689-41	183.58	180.35
BERIZONE (IN. 06/09/97)			
TAB. PO. 100 mg, 60s ea			
160 mg, 60s ea	80087-8689-31	60.58	63.12
200 mg, 60s ea	80087-8689-31	80.58	63.12
250 mg, 60s ea	80087-8689-31	60.58	63.12
BEAUFORD			
ACETOLVIR SODIUM			
PDR. 10 (S.D.V.)			
500 mg, 10s ea	81380-0812-18	528.00	AP
1000 mg, 10s ea	81380-0812-18	1056.00	AP
BOEHR INGENIEUR			
CONIVENT			
ARG. 10, 0.06 mg-0.018 mg/ml			
14.700 gm	80087-8013-14	35.52	
GARNRICK			
MIDRIN (IN. 06/11/97)			
CAP. PO. 325 mg-100 mg-45 mg			
100s ea	80089-8129-08	25.25	
100s ea	80089-8129-18	44.00	
NOLAMINE (IN. 06/11/97)			
TEA. PO. 4 mg-24 mg-30 mg			
100s ea	80089-8294-18	53.40	
250s ea	80089-8294-18	129.60	
RELAXIN (IN. 06/11/97)			
TAB. PO. 400 mg, 100s ea			
500s ea	80089-8883-10	48.90	
1000s ea	80089-8883-10	199.10	
COLEY			
SODIUM FLUORIDE			
LIQ. PO. (DROPS W/DROPPER)			
0.5 mg/ml, 50 ml	80246-0864-48	8.10	
CARMOL HC (IN. 06/11/97)			
CRE. TP. 1%-10%, 30 gm			
100s ea	80337-8858-82	12.64	AT
EL LEXIDE BENZOLONE			
ACTOLVIR			
TAB. PO. 125 mg, 1000 ea			
250 mg, 1000 ea	80081-8831-82	828.15	AA
500 mg, 1000 ea	80081-8831-82	800.65	AA
ALBUTROL SULFATE (IN. 06/11/97)			
TAB. PO. 2 mg, 100s ea			
500s ea	80089-3042-43	26.28	AA
1000s ea	80089-3042-43	124.65	AA
4 mg, 100s ea	80089-3042-43	38.46	AA
500s ea	80089-3042-43	134.89	AA
ALPRAZOLAM (IN. 06/11/97)			
TAB. PO. 0.25 mg			
100s ea, C-IV	80089-3348-43	52.90	AA
500s ea, C-IV	80089-3348-31	258.73	AA
0.5 mg			
100s ea, C-IV	80089-3348-43	66.81	AA
500s ea, C-IV	80089-3348-31	318.83	AA
1 mg			
100s ea, C-IV	80089-3348-43	87.78	AA
500s ea, C-IV	80089-3348-31	425.66	AA
2 mg			
100s ea, C-IV	80089-3348-43	149.24	AA
AMOXICILIN (IN. 06/11/97)			
CAP. PO. 250 mg, 100s ea			
500s ea	80089-3144-23	22.39	AA
1000s ea	80089-3144-31	108.84	AA
500 mg, 30s ea	80089-3144-18	20.94	AA
500s ea	80089-3144-31	188.83	AA
PDR. PO. 125 mg/5 ml			
80 ml	80089-8189-43	2.90	AA
100 ml	80089-8189-40	3.21	AA
150 ml	80089-8189-48	3.70	AA
250 mg/5 ml, 60 ml	80089-8189-43	4.78	AA
100 ml	80089-8189-48	6.19	AA
150 ml	80089-8189-48	8.35	AA
ETODOLAC (IN. 06/11/97)			
CAP. PO. 200 mg, 100s ea			
300 mg, 100s ea	80081-8808-01	110.57	
500 mg, 100s ea	80081-8807-01	175.23	
ELKINS-SINN			
MORPHINE SULFATE (IN. 06/02/97)			
INJ. 10 (M.O.V.)			
10 mg/ml, 10 ml, C-II	80081-2343-41	11.65	B-32
FERRISDALE			
PRAMOXONE (IN. 06/11/97)			
CRE. TP. 1%-10%, 30 gm			
60 gm	80496-8718-04	10.85	
120 gm	80496-8718-04	18.35	
2.5%-1%, 60 gm	80496-8718-04	22.30	
60 gm	80496-8718-04	36.50	
LOT. TP. 1%-1%, 60 ml	80496-8718-04	17.30	
120 ml	80496-8718-04	34.60	
240 ml	80496-8718-04	69.20	
2.5%-1%, 60 ml	80496-8718-04	33.10	
120 ml	80496-8718-04	66.20	
LOT. TP. 1%-1%, 30 gm	80496-8718-04	12.60	
2.5%-1%, 30 gm	80496-8718-04	23.20	

PROD./MFR	UNIT/DOSE	AMOUNT	DATE
PROCRIT[®]			
EPOETIN ALFA			
10,000, 10,000, 30,000 and 20,000 unit/ml vials available in boxes of 6 and packs of 25			
FOREST PHARM			
ESBIC			
TAB. PO. 325 mg-60 mg-40 mg			
100s ea	80136-8811-01	183.24	AA
500s ea	80136-8811-02	471.84	AA
LYCOTHRAPID			
TAB. PO. 0.03 mg, 1000s ea			
0.1 mg, 1000s ea	80456-8323-88	127.20	
0.15 mg, 1000s ea	80456-8323-88	154.64	
0.2 mg, 1000s ea	80456-8323-88	187.96	
0.3 mg, 1000s ea	80456-8323-88	220.40	
FOURERA			
MACITRACIN (H.N. 87/87/87)			
GIN. OP. 500 u/gm.			
3,500 gm	80188-8835-38	3.84	AT
BETAMETHASONE VALERATE (H.N. 87/81/87)			
CRE. TP. 0.1%, 16 gm.			
45 gm	80188-8835-41	4.47	AA
LOT. TP. 0.1%, 80 ml	80188-8835-41	4.47	AA
GIN. TP. 0.1%, 15 gm	80188-8835-41	12.25	AA
45 gm	80188-8835-46	8.80	AA
HYDROXYMETHYL (H.N. 87/81/87)			
GIN. OP. 5 mg/gm, 3,500 gm			
(HOSPITAL PACK)	80188-8835-38	4.43	AT
8 mg/gm, 3,500 gm	24588188-1879-39	106.32	AT
HYDROCORTISONE (H.N. 87/81/87)			
CRE. TP. 1%, 454 gm			
2.5%, 30 gm	80188-8835-01	28.85	AT
GIN. TP. 1%, 30 gm	80188-8835-01	8.38	AT
454 gm	80188-8835-18	3.22	AT
2.5%, 30 gm	80188-8835-18	29.37	AT
GIN. TP. 1%, 30 gm	80188-8835-18	6.38	AT
HYSTATIN (H.N. 87/81/87)			
SUS. PO. 100,000 u/ml			
80 ml	80188-8837-88	8.00	AA
HYSTATIN/TRIAM ACET (H.N. 87/81/87)			
CRE. TP. 100,000 u/gm-0.1%			
15 gm	80188-8837-16	9.24	AT
GIN. TP. 100,000 u/gm-0.1%			
15 gm	80188-8837-16	3.51	AT
30 gm	80188-8837-16	6.34	AT
TRIAMCLOLONE ACETONIDE (H.N. 87/81/87)			
CRE. TP. 0.025%, 16 gm			
80 gm	80188-8837-16	1.70	AT
0.1%, 16 gm	80188-8837-16	1.84	AT
GIN. TP. 0.025%, 80 gm	80188-8837-16	4.20	AT
0.1%, 16 gm	80188-8837-16	1.84	AT
FUJICAWA			
ACYCLOVIR SODIUM			
POL. LI (VIAL)			
500 mg, 10% wa	83323-8706-18	565.30	EE
1000 mg, 10% wa	83323-8710-28	1130.50	EE
CYLOCOCT (H.N. 85/25/87)			
CRE. TP. 0.1%, 15 gm			
30 gm	80488-7854-18	18.45	13.18
60 gm	80488-7854-30	24.50	18.80
LOT. TP. (BOTTLE W/AQUA)			
81%, 20 ml	80488-7854-30	41.19	32.84
(BOTTLE W/AQUA)			
0.1%, 60 ml	80488-7854-30	37.84	30.11
GIN. TP. 0.1%, 15 gm	80488-7854-30	18.45	13.18
30 gm	80488-7854-30	24.50	18.80
60 gm	80488-7854-30	41.19	32.84
NEUPENT			
PCR. IN. 300 mg. ea			
	80488-9677-16	64.78	79.00
SALDERMA			
BENZAC AC (H.N. 86/81/87)			
GEL. TP. 2.5%, 50 gm			
90 gm	80288-3829-88	14.06	11.25
5%, 60 gm	80288-3829-88	18.84	13.30
80 gm	80288-3829-88	14.56	11.63
10%, 60 gm	80288-3829-88	19.00	15.20
10%, 60 gm	80288-3829-88	14.84	11.95
90 gm	80288-3829-88	18.81	15.85
LIQ. TP. 2.5%, 240 ml	80288-3829-88	18.80	15.75
5%, 240 ml	80288-3829-88	22.31	17.84
10%, 240 ml	80288-3829-88	24.54	19.63
BENZAC W (H.N. 86/81/87)			
GEL. TP. 2.5%, 50 gm			
90 gm	80288-3829-88	13.76	11.00
5%, 60 gm	80288-3829-88	18.80	13.20
80 gm	80288-3829-88	14.10	11.25
10%, 60 gm	80288-3829-88	19.00	15.80
90 gm	80288-3829-88	14.81	11.85
LIQ. TP. 2.5%, 120 ml	80288-3829-88	18.80	15.60
240 ml	80288-3829-88	22.31	17.85
10%, 240 ml	80288-3829-88	24.54	19.63